

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
NEW BERN DIVISION

IN RE:) CASE NO. 15-02700-5-DMW
)
PEPPERTREE-ATLANTIC BEACH)
ASSOCIATION, INC.)
)
DEBTOR) CHAPTER 11 PROCEEDING

BANKRUPTCY ADMINISTRATOR'S MOTION FOR PRODUCTION OF
DOCUMENTS PURSUANT TO BANKRUPTCY RULE 2004

NOW COMES, the Bankruptcy Administrator for the Eastern District of North Carolina, by and through her undersigned counsel, and respectfully moves this Court for an order upon the Debtor to produce certain documents pursuant to Bankruptcy Rule 2004. The Bankruptcy Administrator requests that the Debtor produce the documents that are indicated below:

- Board meeting minutes of the debtor for the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).
- Detailed accounting of the Association's Dues and Expenses for the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).
- Copies of bank statements and cancelled checks for all bank accounts held by the debtor within the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).
- Detailed operating budget of the debtor for the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).

The above documents requested for production are to be delivered by the 22nd day of June, 2015. The above documents requested are to be submitted to the following office:

- United States Bankruptcy Administrator
150 Reade Circle
Greenville, NC 27858
(email: Scott_Kirk@nceba.uscourts.gov)

WHEREFORE, the Bankruptcy Administrator requests that this Court issue an order upon the Debtor(s) to produce the above requested documents by June 22, 2015, and for such other and further relief the Court deems just and proper.

Dated this 8th day of June, 2015.

Respectfully submitted,

Marjorie K. Lynch
Bankruptcy Administrator

By: /s/ C. Scott Kirk
C. Scott Kirk
Staff Attorney
NC Bar No. 40349
Bankruptcy Administrator's Office
150 Reade Circle
Greenville, NC 27858
(252) 917-6156
Scott_Kirk@nceba.uscourts.gov

CERTIFICATE OF SERVICE

I, Amanda L. Gaster, of 150 Reade Circle, Greenville, North Carolina, 27858, certify:

That I am, and at all times hereinafter mentioned was more than eighteen (18) years of age;

That on the 8th day of June, 2015, I served copies of the foregoing document on the following:

Philip W. Paine
Debtor's Attorney

By electronic service via cm/ecf, and,

Peppertree-Atlantic Beach Association, Inc.
715 W Fort Macon Road
Atlantic Beach, NC 28512

by depositing a copy thereof in an envelope bearing sufficient postage in the United States mail.

I certify under penalty of perjury that the foregoing is true and correct.

Dated this 8th day of June, 2015.

By: /s/ Amanda L. Gaster
Amanda L. Gaster
Paralegal
150 Reade Circle
Greenville, NC 27858